| 1 | Randall E. Kay (State Bar No. 149369) | Daniel Johnson Jr. (Bar No. 57409) | |
|----|--|---|--|
| | rekay@jonesday.com | Mario Moore (Bar No. 231644) | |
| 2 | Douglas L. Clark (State Bar No. 279408) | Robert G. Litts (Bar No. 205984) | |
| 3 | dlclark@jonesday.com JONES DAY | DAN JOHNSON LAW GROUP, LLP 400 Oyster Point Blvd., Suite 321 | |
| | 4655 Executive Drive, Suite 1500 | South San Francisco, CA 94080 | |
| 4 | San Diego, CA 92121.3134 | Telephone: +1.415.604.4500 | |
| _ | Telephone: +1.858.314.1200 | dan@danjohnsonlawgroup.com | |
| 5 | Facsimile: +1.844.345.3178 | mario@danjohnsonlawgroup.com robert@danjohnsonlawgroup.com | |
| 6 | Patrick T. Michael (State Bar No. 169745) | 100ert@danjonnsomawgroup.com | |
| | pmichael@jonesday.com | Attorneys for Defendant | |
| 7 | Marcus S. Quintanilla (State Bar No. 205994) | UNITED MICROELECTRONICS | |
| 8 | mquintanilla@jonesday.com JONES DAY | CORPORATION, and FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD. | |
| 0 | 555 California Street, Suite 2600 | INTEGRATED CIRCUIT CO., LID. | |
| 9 | San Francisco, CA 94104.1501 | Lyle B. Vander Schaaf (pro hac vice) | |
| 10 | Telephone: +1.415.626.3939 | Evi T. Christou (pro hac vice) | |
| 10 | Facsimile: +1.415.875.5700 | Fei Hu (pro hac vice) | |
| 11 | Emily M. Whitcher (State Bar No. 321790) | BRINKS GILSON & LIONE | |
| | ewhitcher@jonesday.com | 1775 Pennsylvania Ave, NW, Suite 900 | |
| 12 | JONES DAY | Washington, DC 20006 | |
| 13 | 555 South Flower Street, Fiftieth Floor | Telephone: (202) 296-8700 | |
| 13 | Los Angeles, CA 90071-9997 Telephone: +1.213.489.3939 | lvanderschaaf@brinksgilson.com | |
| 14 | Facsimile: +1.213.243.2539 | echristou@brinksgilson.com | |
| | | fhu@brinksgilson.com | |
| 15 | Attorneys for Plaintiff MICRON TECHNOLOGY, INC. | Harold V. Johnson (pro hac vice) | |
| 16 | MICKON TECHNOLOGI, INC. | BRINKS GILSON & LIONE | |
| | | 455 N. Cityfront Plaza Drive, Suite 3600 | |
| 17 | | Chicago, IL 60611 | |
| 18 | | Telephone: (312) 321-4200 | |
| 10 | | hjohnson@brinksgilson.com | |
| 19 | | Attorneys for Defendant FUJIAN JINHUA INTEGRATED | |
| 20 | | CIRCUIT CO., LTD. | |
| 20 | | 01110011 001, 2121 | |
| 21 | UNITED STATES D | | |
| | NORTHERN DISTRICT OF CALIFORNIA | | |
| 22 | | | |
| 23 | MICRON TECHNOLOGY, INC., | Case No. 3:17-CV-06932-MMC | |
| | Plaintiff, ' | | |
| 24 | | STIPULATION AND [PROPOSED] | |
| 25 | V. | AMENDMENT TO PROTECTIVE ORDER TO ADD PARTY; ORDER | |
| ر_ | UNITED MICROELECTRONICS | ORDER TO HOD THEIT, ORDER | |
| 26 | CORPORATION, et al., | | |
| 27 | Defendants. | | |
| 27 | | _ | |
| 28 | 1 | 3:17-CV-06932-MMC | |
| | STIPULATION AND [PROPOSED] AMENDMENT TO PROTECTIVE ORDER TO ADD PARTY; | | |
| | ORDER | | |

| 1 | IT IS HEREBY STIPULATED by and between Plaintiff Micron Technology, Inc | | |
|----|---|--|--|
| 2 | ("Micron") Defendant United Microelectronics Corporation ("UMC"), and Defendant Fujian Jinhu | | |
| 3 | Integrated Circuit Co., Ltd. ("Jinhua") through their respective attorneys of record to amend th | | |
| 4 | current Protective Order (Dkt. 74) for the purposes of adding information related to Jinhua for the | | |
| 5 | Protective Order and updating Exhibit A to the Protective Order. The Parties stipulate to being bound | | |
| 6 | to the underlying Protective Order and the following amendments to the same: | | |
| 7 | Change paragraph 2.4 of the Protective Order to read as follows: | | |
| 8 | "2.4 <u>Designated Corporate Representative:</u> The two employees designated by each | | |
| 9 | respective party, who are not involved with competitive decision making, and seek to have access | | |
| 10 | to "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" information in this matter. | | |
| 11 | (a) Employees for Micron Technology, Inc.: Jan Bissey and one more to be named | | |
| 12 | later. | | |
| 13 | (b) Employees for United Microelectronics Corporation: To be determined. | | |
| 14 | (c) Employees for Fujian Jinhua Integrated Circuit Co., Ltd.: To be determined. | | |
| 15 | Change paragraph 2.5 of the Protective Order to read as follows: | | |
| 16 | "2.5 <u>Designated House Counsel</u> : House Counsel who seek access to "HIGHLY | | |
| 17 | CONFIDENTIAL – ATTORNEYS' EYES ONLY" information in this matter. | | |
| 18 | (a) In-house attorneys for Micron Technology, Inc.: David Ashmore, Esq. and Michael | | |
| 19 | Myers, Esq. | | |
| 20 | (b) In-house attorneys for United Microelectronics Corporation: Lucas Chang and one | | |
| 21 | other attorney to be named later. | | |
| 22 | (c) In-house attorneys for Fujian Jinhua Integrated Circuit Co., Ltd.: To be determined | | |
| 23 | Change Exhibit A of the Protective Order to read as follows: | | |
| 24 | | | |
| 25 | | | |
| 26 | | | |
| 27 | | | |
| 28 | 2 3:17-CV-06932-MMC | | |

| | //TXXXXXXX | | |
|----|--|--|--|
| 1 | " <u>EXHIBIT A</u> | | |
| 2 | ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND | | |
| 3 | I, [print or type full name], of | | |
| 4 | [print or type full address], declare under penalty of perjury | | |
| 5 | that I have read in its entirety and understand the Stipulated Protective Order that was issued by the | | |
| 6 | United States District Court for the Northern District of California on July 5, 2018, as amended on | | |
| 7 | February, 2019, in the case of Micron Technology Inc. v. United Microelectronics Corp. et. al, | | |
| 8 | Case No. 3:17-CV-06932-MMC. I agree to comply with and to be bound by all the terms of this | | |
| 9 | Stipulated Protective Order and I understand and acknowledge that failure to so comply could | | |
| 10 | expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will | | |
| 11 | not disclose in any manner any information or item that is subject to this Stipulated Protective | | |
| 12 | Order to any person or entity except in strict compliance with the provisions of this Order. | | |
| 13 | I further agree to submit to the jurisdiction of the United States District Court for the | | |
| 14 | Northern District of California for the purpose of enforcing the terms of this Stipulated Protective | | |
| 15 | Order, even if such enforcement proceedings occur after termination of this action. | | |
| 16 | I hereby appoint [print or type full name] of | | |
| 17 | [print or type full address and telephone number] | | |
| 18 | as my California agent for service of process in connection with this action or any proceedings | | |
| 19 | related to enforcement of this Stipulated Protective Order. | | |
| 20 | | | |
| 21 | Date: | | |
| 22 | | | |
| 23 | City and State where sworn and signed: | | |
| 24 | | | |
| 25 | Printed name: | | |
| 26 | Ciamatuma. | | |
| 27 | Signature:" | | |
| 28 | 3 3:17-CV-06932-MMC | | |
| | STIPULATION AND [PROPOSED] AMENDMENT TO PROTECTIVE ORDER TO ADD PARTY; | | |

STIPULATION AND [PROPOSED] AMENDMENT TO PROTECTIVE ORDER TO ADD PARTY; ORDER

| 1 | IT IS SO STIPULATED. | |
|----|-----------------------------------|--|
| 2 | Dated: February 12, 2019 | Respectfully submitted, |
| 3 | J | ONES DAY |
| 4 | В | By: <u>s/ Randall E. Kay</u> Randall E. Kay |
| 5 | | • |
| 6 | | ttorneys for Plaintiff IICRON TECHNOLOGY, INC. |
| 7 | Г | OAN JOHNSON LAW GROUP, LLP |
| 8 | В | By: <u>s/ Daniel Johnson, Jr.</u> Daniel Johnson, Jr. |
| 9 | | |
| 10 | | ttorneys for Defendant UNITED MICROELECTRONICS |
| 11 | | CORPORATION, and FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD. |
| 12 | В | BRINKS GILSON & LIONE |
| 13 | В | By: <u>s/ Lyle B. Vander Schaaf</u> Lyle B. Vander Schaaf |
| 14 | | |
| 15 | \parallel | ttorneys for Defendant UJIAN JINHUA INTEGRATED CIRCUIT CO., |
| 16 | | TD. |
| 17 | | |
| 18 | | |
| 19 | | ORDER |
| 20 | PURSUANT TO STIPULATION, IT | IS SO ORDERED. |
| 21 | | 4 |
| 22 | DATED: February 12, 2019 | Mafine M. Cherney |
| 23 | | The Honorable Maxine M. Chesney United States District Judge |
| 24 | | Officed States District Judge |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | STIPLILATION AND (PROPOSED) AMEND | 4 3:17-CV-06932-MMC MENT TO PROTECTIVE ORDER TO ADD PARTY; |
| | | and the state of t |

ORDER